

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Campbell Family Enterprises, Inc, Debtor**

**Case No. 25-10364-SDM  
CHAPTER 11**

**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Hearing Notice and Motion to Dismiss were forwarded on July 11, 2025, by US Mail, postage prepaid, to all other parties listed on the attached master mailing list (matrix):

By Electronic CM/ECF Notice:

Robert A. Byrd, Trustee

Arnulfo U. Luciano, Attorney for Creditor

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:

CAMPBELL FAMILY ENTERPRISES, INC

CASE NO: 25-10364

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 11

On 7/11/2025, I did cause a copy of the following documents, described below,  
Hearing Notice and Motion to Dismiss

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/11/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE:

CAMPBELL FAMILY ENTERPRISES, INC

CASE NO: 25-10364

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 11

On 7/11/2025, a copy of the following documents, described below,  
Hearing Notice and Motion to Dismiss

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/11/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
05371  
CASE 25-10364-SDM  
NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN  
THU JUL 10 17-00-24 CDT 2025

AMUR  
PO BOX 911685  
DENVER CO 80291-1685

AMERICAN EXPRESS  
PO BOX 297800  
FORT LAUDERDA FL 33329-7800

AMERICAN EXPRESS NATIONAL BANK  
CO BECKET AND LEE LLP  
PO BOX 3001  
MALVERN PA 19355-0701

AMUR EQUIPMENT FINANCE INC  
CO KYE LAW GROUP PC  
201 OLD COUNTRY ROAD SUITE 120  
MELVILLE NY 11747-2725

ARNOLD U LUCIANO  
JACKS GRIFFITH LUCIANO PA  
PO BOX 1209  
CLEVELAND MS 38732-1209

EXCLUDE

~~ROBERT A BYRD~~  
~~BYRD WICER~~  
~~P O BOX 1939~~  
~~BILOXI MS 39533-1939~~

ROBERT ALAN BYRD  
145 MAIN STREET  
P O BOX 1939  
BILOXI MS 39533-1939

CFG MERCAHT SOLUTIONS  
180 MAIDEN LANE  
FLOOR 15  
NEW YORK NY 10038-5150

(P)CORPORATE BILLING  
ATTN JANICE HEARD  
PO BOX 1726  
DECATUR AL 35602-1726

DEBTOR  
CAMPBELL FAMILY ENTERPRISES INC  
1214 WAVERLY AVE  
CLEVELAND MS 38732-4139

CAPITAL ONE BANK  
PO BOX 60519  
CITY OF INDUS CA 91716-0519

CAPITAL ONE NA  
BY AIS INFOSOURCE LP AS AGENT  
PO BOX 71083  
CHARLOTTE NC 28272-1083

CHASE  
PO BOX 15548  
WILMINGTON DE 19886-5548

CLEVELAND STATE BANK  
PO BOX 1000  
CLEVELAND MS 38732-1000

CLEVELAND STATE BANK  
PO BOX 1000  
110 COMMERCE AVE  
CLEVELAND MS 38732-2736

CLEVELAND STATE BANK  
CO ARNOLD U LUCIANO  
PO BOX 1209  
CLEVELAND MS 38732-1209

GENERAL TRUCK  
1973 EAST BROOKS ROAD  
PO BOX 161202  
MEMPHIS TN 38186-1202

(P)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVICE  
CO US ATTORNEY  
501 EAST COURT ST  
STE 4430  
JACKSON MS 39201-5025

LIFT FUND INC  
2014 S HACKBERRY  
SAN ANTONIO TX 78210-3541

LIFT FUND INC  
2014 S HACKBERRY ST  
2014 S HACKBERRY ST  
SAN ANTONIO TX 78210-3541

ARNULFO U LUCIANO  
JACKS GRIFFITH LUCIANO PA  
PO BOX 1209  
CLEVELAND MS 38732-1209

MS TAX COMMISSION  
PO BOX 22808  
JACKSON MS 39225-2808

MISSISSIPPI DEPARTMENT OF REVENUE  
BANKRUPTCY SECTION  
POST OFFICE BOX 22808  
JACKSON MS 39225-2808

NORTH MILL EQIPMENT FI  
PO BOX 77840  
SPRINGFIELD OH 45501-7840

NORTH MILL EQUIPMENT FINANCE LLC  
601 MERRITT 7 SUITE 5  
NORWALK CT 06851-1097

PHILLIP CAMPBELL  
1214 WAVERLY STREET  
CLEVELAND MS 38732-4139

~~EXCLUDE~~  
~~THOMAS C ROLLINS JR~~  
~~THE ROLLINS LAW FIRM PLLC~~  
~~PO BOX 13767~~  
~~JACKSON MS 39226-3767~~

TOPMARK FUNDING LLC  
516 GIBSON DR  
SUITE 160  
ROSEVILLE CA 95678-5792

TRUIST BANK  
PO BOX 85041  
RICHMOND VA 23285-5041

TRUIST BANK SUPPORT SERVICES  
PO BOX 85092  
RICHMOND VA 23286-0001

U S ATTORNEY  
NORTHERN DISTRICT OF MISSISSIPPI  
900 JEFFERSON AVENUE  
OXFORD MS 38655-3608

U S SECURITIES AND EXCHANGE COMMISSION  
OFFICE OF REORGANIZATION  
950 EAST PACES FERRY ROAD SUITE 900  
ATLANTA GA 30326-1382

~~EXCLUDE~~  
~~U S TRUSTEE~~  
~~501 EAST COURT STREET SUITE 6430~~  
~~JACKSON MS 39201-5022~~

(P)US BANK  
PO BOX 5229  
CINCINNATI OH 45201-5229

US ATTORNEY GENERAL  
US DEPT OF JUSTICE  
950 PENNSYLVANIA AVENUE  
WASHINGTON DC 20530-0001

UNITED FIRST  
299 NE 191ST STREET  
MIAMI FL 33180

UNITED FIRST LLC 281314  
CO KAMINSKI LAW PLLC  
PO BOX 247  
GRASS LAKE MI 49240-0247

STEVEN USRY  
DOJUST  
501 E COURT STREET  
SUITE 6-430  
JACKSON MS 39201-5022

VOLVO FINANCIAL SERVIC  
PO BOX 72470236  
PHILADELPHIA PA 19170-0001

VOLVO FINANCIAL SERVICES  
PO BOX 26131  
GREENSBORO NC 27402-6131

WEBB TRUCKING LLC  
501 ARRINGTON RD  
CLEVELAND MS 38732

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

In Re:	Campbell Family Enterprises, Inc	)	Case No.: 25-10364-SDM
	Debtor(s)	)	Chapter: 11
		)	Judge: Selene D. Maddox
		)	
		)	

PLEASE TAKE NOTICE that a hearing will be held at

Go to Zoom.us/join, Enter Meeting ID 160 853 64415, and Passcode 3699380, OR  
call (646) 828-7666

on 8/28/25 at 10:00 AM

Responses Due: 8/4/25

to consider and act upon the following:

**79** – Motion to Dismiss Case Filed by Thomas C. Rollins Jr. on behalf of Campbell  
Family Enterprises, Inc. (Rollins, Thomas)

**This hearing will be conducted by VIDEO.** For procedures regarding video hearings, please see the Standing  
Order Regarding Video Hearings Before Judge Selene D. Maddox available on the Standing Orders page of the  
Court's website at [www.msnb.uscourts.gov](http://www.msnb.uscourts.gov).

Should any party receiving this notice respond or object to said motion such response or objection is required to  
be filed with the Clerk of this court and served on the Attorney for Movant on or before said response due date. If any  
objection or response is filed, an evidentiary hearing will be held on the above mentioned date regarding any facts not  
stipulated to by the parties. If no objection or response is filed, the Court may consider said motion immediately after  
the objection or response due date. Please note that a corporation, partnership, trust, or other business entity, other  
than a sole proprietorship, may appear and act in Bankruptcy Court only through a licensed attorney.

A copy of the motion is required to be served pursuant to Rules 9013 and 9014. THE MOVING PARTY'S  
ATTORNEY IS REQUIRED BY THE STANDING ORDER TO PERFORM NOTICING AS TO SAID MOTION,  
THE NOTICE OF HEARING, AND THE OBJECTION DEADLINE, ACCORDING TO THE TERMS OF SAID  
STANDING ORDER. Please see the Standing Order available at:  
[http://www.msnb.uscourts.gov/sites/msnb/files/so\\_notic\\_revised.pdf](http://www.msnb.uscourts.gov/sites/msnb/files/so_notic_revised.pdf)

Dated: 7/9/25

Shallanda J. Clay  
Clerk, U.S. Bankruptcy Court  
BY: VSD  
Deputy Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Campbell Family Enterprises, Inc, Debtor**

**Case No. 25-10364-SDM  
CHAPTER 11**

**DEBTOR'S MOTION TO DISMISS CHAPTER 11 CASE**

COMES NOW, Campbell Family Enterprises, Inc. ("Debtor"), by and through counsel, and moves this Court to Dismiss this chapter 11 case, and in support thereof, would respectfully show the Court as follows:

1. Pursuant to 11 U.S.C. § 1112(b)(1), the Debtor seeks dismissal of its Chapter 11 case on the grounds that (a) there is cause for dismissal because the Debtor has ceased operations, is incurring continuing losses, and lacks the ability to comply with its confirmed plan; and (b) dismissal is in the best interests of creditors and the estate.
2. This Court has jurisdiction over this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2). Venue is proper in this District under 28 U.S.C. §§ 1408 and 1409.
3. On June 27, 2025, the Court entered an order confirming the Debtor's Second Amended Plan of Reorganization (the "Plan"). The Plan anticipated that the Debtor would continue its trucking operations, generate revenue, and make required post-confirmation plan payments to secured and unsecured creditors.
4. Since confirmation, the Debtor has suffered a series of crippling events:
  - a. Multiple mechanical breakdowns of its trucks have rendered its fleet inoperable;
  - b. A driver resigned and temporarily refused to return the truck, effectively "holding it hostage";
  - c. Other drivers refused to work around the recent holiday, further halting operations;

d. The Debtor was unable to maintain required insurance on its vehicles, and has therefore parked all trucks.

As a result, the Debtor has no ongoing revenue, cannot meet its insurance obligations, and is unable to make distributions under the Plan.

5. Section 1112(b)(1) of the Bankruptcy Code provides that, on request of a party in interest and after notice and a hearing, the Court shall dismiss a Chapter 11 case “for cause.” 11 U.S.C. § 1112(b)(1). Cause exists here because:

a. The Debtor has experienced a substantial or continuing loss to the estate and there is no reasonable likelihood of rehabilitation. § 1112(b)(4)(A).

b. The Debtor has been unable to effectuate substantial consummation of its Plan. § 1112(b)(4)(J).

c. The Debtor is unable to comply with its obligations under the confirmed Plan. § 1112(b)(4)(M).

Once the Debtor ceased generating revenue—due to mechanical failures, driver issues, and lack of insurance—its Plan became infeasible. The Debtor cannot pay post-confirmation administrative expenses, fund insurance premiums, or make Plan payments.

6. Conversion to Chapter 7 is not an option: there is no unencumbered property available to fund a liquidation, and the administrative burden of a Chapter 7 trustee would unnecessarily deplete estate assets. Dismissal, rather than conversion, allows secured creditors to pursue their state-law remedies against the Debtor’s collateral without the costs and delay of a sale under Section 363. Dismissal preserves creditor rights and avoids further administrative diminution of the estate.



WHEREFORE, the Debtor respectfully requests that the Court enter an order, substantially in the form attached hereto:

- A. Granting this Motion;
- B. Dismissing the Debtor's Chapter 11 case; and
- C. Granting such other and further relief as the Court deems just and proper.

Respectfully Submitted,

Campbell Family Enterprises, Inc.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr., MSB 103469  
The Rollins Law Firm, PLLC  
P.O. Box 13767,  
Jackson, MS 39236  
[trollins@therollinsfirm.com](mailto:trollins@therollinsfirm.com)  
601-500-5533

**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., attorney for Campbell Family Enterprises, Inc., do hereby certify that I have this date electronically transmitted via CM/ECF Noticing, a true and correct copy of the above and foregoing MOTION to the following on the day and year hereinafter set forth:

Robert A. Byrd  
rab@byrdwiser.com, rbyrdMSN@ecf.axosfs.com

Robert A. Byrd on behalf of Trustee Robert A. Byrd  
rab@byrdwiser.com, rbyrdMSN@ecf.axosfs.com

Robert Alan Byrd on behalf of Trustee Robert A. Byrd  
rab@byrdwiser.com

Arnulfo U. Luciano on behalf of Creditor Cleveland State Bank  
aluciano@jlpalaw.com, mhankins@jlpalaw.com

U. S. Trustee  
USTPRegion05.AB.ECF@usdoj.gov

United States Trustee  
USTPRegion05.JA.ECF@usdoj.gov

Steven Usry on behalf of U.S. Trustee U. S. Trustee  
steven.usry@usdoj.gov, cara.pardue@usdoj.gov

**SO CERTIFIED**, this the 9<sup>th</sup> day July, 2025.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.